

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants.

No. 1:19-cr-10080-NMG

**DEFENDANTS' MOTION FOR LEAVE TO FILE REPLY BRIEF
IN SUPPORT OF DEFENDANTS' MOTION TO SEQUESTER WITNESSES**

Defendants Gamal Abdelaziz and John Wilson moved to sequester witnesses during trial pursuant to Federal Rule of Evidence 615. The Government has filed a Response to the Defendants' straightforward Motion to Sequester Witnesses, raising multiple arguments and unprecedented requests. Defendants therefore respectfully move for leave to file a short reply brief to respond to the Government's arguments and requests. A copy of the Defendants' proposed reply is attached hereto as **Exhibit A**.

The Government takes no position regarding this motion for leave.

Respectfully submitted,

Date: September 8, 2021

By their counsel

/s/ Michael Kendall

Michael Kendall (BBO #544866)
Lauren Papenhausen (BBO# 655527)
WHITE & CASE LLP
75 State Street
Boston, MA 02109-1814
Telephone: (617) 979-9310
michael.kendall@whitecase.com
lauren.papenhause@whitecase.com

Andrew Tomback (pro hac vice)
McLaughlin & Stern, LLP
260 Madison Avenue
New York, NY 10016
Telephone: (212) 448-1100
ATomback@mclaughlinstern.com

Counsel for John Wilson

/s/ Brian T. Kelly

Brian T. Kelly (BBO # 549566) Joshua
C. Sharp (BBO # 681439) Lauren M.
Maynard (BBO # 698742) NIXON
PEABODY LLP
53 State Street
Boston, MA 02109
(617) 345-1000
bkelly@nixonpeabody.com
jsharp@nixonpeabody.com
lmaynard@nixonpeabody.com
Robert Sheketoff (BBO # 457340)
One McKinley Square
Boston, MA 02109
(617)-367-3449

Counsel for Gamal Abdelaziz

CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1

The undersigned counsel hereby certifies that counsel for Defendants have conferred with the Government and attempted in good faith to resolve or narrow the issues raised by this motion.

/s/ Michael Kendall

Michael Kendall

CERTIFICATE OF SERVICE

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall

Michael Kendall